

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Norfolk Division

R.M.S. TITANIC, INC.,
successor-in-interest to
Titanic Ventures, limited partnership,
Plaintiff,

v.

Civil Action No. 2:93cv902

THE WRECKED AND ABANDONED VESSEL,
ITS ENGINES, TACKLE, APPAREL,
APPURTENANCES, CARGO, ETC., LOCATED
WITHIN ONE (1) NAUTICAL MILE OF A POINT
LOCATED AT 41 43/ 32' NORTH LATITUDE
AND 49 56' 49" WEST LONGITUDE,
BELIEVED TO BE THE R.M.S. TITANIC
in rem,

Defendant.

RESPONSE BY PREMIER ACQUISITION HOLDINGS LLC
TO COURT'S ORDER DATED DECEMBER 20, 2018

Intervenor Premier Acquisition Holdings LLC respectfully responds to this Court's Order dated December 20, 2018 (ECF No. 538) in which it requested that counsel for PAHL clarify why Mr. Gilbert Li authorized himself to act on behalf of Alta Fundamental Advisers SP LLC ("Alta Fundamental Advisers SP") when there appears to be at least one other individual who could provide that authorization, and responds as follows:

Mr. Gilbert Li and Mr. Jeremy Carton are both Managing Partners of Alta Fundamental Advisers SP, and together own 100% of the voting and economic interests in Alta Fundamental Advisers SP. Under the operating agreement for Alta Fundamental Advisers SP, Mr. Li is authorized to act on behalf of Alta Fundamental Advisers SP, and his execution of the December 18, 2018 Officer's Certificate for Alta Fundamental Advisers SP was an appropriate exercise of that authority. Nevertheless, in response to the Court's Order and to make clear that ECF No. 537-2 accurately reflects the consent and authorization stated therein, attached hereto as Exhibit

A is a new Officer's Certificate for Alta Fundamental Advisers SP, dated December 20, 2018, which is signed by both Mr. Li and Mr. Carton.

Respectfully submitted,

/s/ David G. Barger

David G. Barger, VSB #21652
*Attorney for Intervenor Premier Acquisition
Holdings LLC*
GREENBERG TRAURIG, LLP
1750 Tysons Boulevard, Suite 1200
McLean, Virginia 22102
Tel: (703) 749-1300
Fax: (703) 749-1301
E-Mail: BargerD@gtlaw.com

CERTIFICATE OF SERVICE

I hereby certify that on this 21st day of December 2018, Intervenor Premier Acquisition Holdings LLC electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all counsel of record.

/s/ David G. Barger

David G. Barger (VSB # 21652)

Email: bargerd@gtlaw.com

GREENBERG TRAURIG, LLP

1750 Tysons Blvd., Suite 1000

McLean, VA 22102

Telephone: (703) 749-1307

Facsimile: (703) 714-8307

*Attorney for Intervenor Premier Acquisitions
Holdings, LLC*